PATENT
Docket No.: CISCO-3550

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Group Art Unit: 2154	Examiner: Patel, Ashokkumar B.
Serial No.: 09/922,175	Filed: August 1, 2001
In re Application of: James E. Kracht	
Confirmation No.: 7564	Customer No.: 28661

REPLY BRIEF

Commissioner for Patents
P.O. Box 1450
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Dear Sir:

In response to the Examiners Answer dated March 12, 2008, kindly find the Reply Brief on Behalf of Appellant.

REPLY BRIEF ON BEHALF OF APPELLANT

This Reply Brief is in response to the Examiner's Answer Brief Mailed March 12, 2008.

The examiner asserted that Fee taught "*verifying that a system switch processor ("SSP")*" (Col. 8 LL 33-38 "DCA"):

> *Packets destined for the Distributed Chassis Agent DCA (i.e., packets using the chassis IP/MAC address as the destination address) may arrive at the chassis via any one (or more) of its front panel ports (see ports 25, 27, 29 in FIG. 2), or in the case of the present implementation, it may also arrive via the SMB10, as the SMB10 is externalized. The packet is terminated (from the network point of view) at the entry point to the chassis. The module terminating the packet has two choices after it has terminated a packet destined to the DCA:*
>
> *a) It may service the packet itself (i.e. act as the DCA) or*
>
> *b) It may forward the packet to another module for service.*

But the present specification defines an SSP ("System Switch Processor") as "*Slot 7, 220, may be dedicated to a system switch processor ("SSP") which is an Ethernet switch that passes data among all cards in the ICS chassis 200 and to any other Ethernet switches connected to the system. Slot 7, 220, is designed to house an SSP which is an Ethernet switch, thus slot 7, 220, is represented in FIG. 2 as being operationally coupled via the Ethernet switch to slots 1 through 6, 210. Slot 7, 220, may be directly coupled to slot 8, 230. Said coupling is represented by connector 240.*" (Page 9 LL 12-18). Contrast this with Fee's DCA, which is not a module, but rather a Distributed Chassis Architecture (Summary, Col. 2, LL 28-39):

> *A distributed chassis agent ("DCA") for a network is provided which enables the chassis to be managed as a single system, and wherein any module can perform the management function or it can be performed by multiple modules simultaneously. The system scales to increasing module complexity and number as it spreads its workload across the modules contained within the chassis, discriminating against the most used modules. Using this system the degree of fault tolerance for the management of the chassis is equal to the number of modules contained within the chassis, as each module may be capable of performing the management function for the entire chassis.*

Thus, a DCA is not an SSP because the SSP 220 is an Ethernet switch in a router chassis connecting the other communications modules 210 together and to other Ethernet switches (see FIG. 2), whereas the DCA is an architecture that allows the different slots or modules 18 (FIG. 1), 24, 26, 28 (FIG. 2), 32-36 (FIG. 3) in a router chassis 10 (FIG. 1) to act and appear as a single system. Viewing Fee's FIG. 3, the DCA is essentially software that runs in the modules 18 (FIG. 1), 24, 26, 28 (FIG. 2), 32-36 (FIG. 3), whereas the SSP 220 (FIG. 2) is closer to the Common Network 30 (though with intelligence). The Common Network 30 is not an SSP 220 either since the SSP 220 contains sufficient intelligence to route packets between modules and other Ethernet switches and implement the claimed steps.

One basic difference between Fee and the presently claimed invention is that Fee is totally decentralized, using the DCA to appear as a single system to the outside. The presently claimed invention is more centralized, as evidenced by FIG. 2 which shows network modules 210 (similar to Fee's networking modules 18 (FIG. 1), 24, 26, 28 (FIG. 2), 32-36 (FIG. 3)) communicating with each other via the SSP 220 (FIG. 2). Fee's

networking modules do not provide the same functionality as the SSP 220, since they do not provide for the communications between and among modules and with other Ethernet switches. For all these reasons, this element is missing from the Fee reference.

The examiner further asserts that Fee shows verifying that an SSP "*has been assigned an IP address*" (Col. 6 LL 21-54):

> *Each module automatically assigns its own internal IP address based on its own information about the chassis in which it is installed, the slot it occupies and the number of hosts it supports. A 127.xx.xx.xx class A network number is used to ensure that internally assigned IP addresses will not clash with any externally assigned IP address. IP datagrams, when encapsulated for transmission over Ethernet, use the Ethernet protocol type assigned for IP protocol, namely type 080Oh. IP datagrams using the internally assigned addresses, when encapsulated for transmission over the SMB10, use the Ethernet protocol type 81CFh. IP datagrams using the internally assigned addresses, when encapsulated for transmission over the SMB1, use the LLAP protocol type 3. These protocols are described in and are readily known to those skilled in the art. By way of illustration, FIG. 4 shows (on the left) an "externally" addressed IP packet 42 encapsulated for Ethernet, with SMB10 driver 44 accessing the destination address DA (43) in the header of packet 42. FIG. 4 shows on the right an "internally" addressed IP packet 46 encapsulated for Ethernet, wherein the SMB10 driver 44 accesses the IP packet or data portion 47 of packet 46.*

Thus, each Fee module 32-36 is automatically assigned a unique 127.xx.xx.xx Class A IP address based on its chassis location, and the router itself is assigned an IP address. But notably, there is no test taught or shown for verifying that any module has been assigned an IP address. Rather, it is assumed to have been completed, and thus no test for

"*verifying that a system switch processor ("SSP") has been assigned an IP address*" is disclosed, taught, or suggested. This element is missing from the Fee reference.

The examiner further asserted that Fee taught "*requesting a discovery protocol data package from said SSP*" (Col 8 LL 47-55):

> *The DCA uses MIBs to gather information about the chassis and to effect control on the chassis. A MIB is a collection of managed objects (MOs) organized into a naming (MIB) tree with each object having a unique name or identifier within the tree. The identifier is known as an OID or Object IDentifier. In order for the DCA to operate as a single entity across all the modules in the chassis, all the MIBs supported by the chassis must be distributed across all the modules.*

However, Fee shows a distributed architecture for MIBs (see FIGs. 5-8) where each chassis module 18 (FIG. 1), 24, 26, 28 (FIG. 2), 32-36 (FIG. 3) contains a virtual representation of the MIB tree, with the specific MIB entry for any module being located in that module. Notably though, the MIB (and MIB packets) cannot be requested from the SSP, since, as noted above, the SSP is an Ethernet switch connecting modules.

Another way to view this is to note that in Fee, the configuration information is fully distributed throughout each of the chassis modules 18 (FIG. 1), 24, 26, 28 (FIG. 2), 32-36 (FIG. 3), whereas in the presently claimed invention, it is maintained in an SSP 220 (FIG. 2) and provided to the other chassis modules 210 (FIG. 2) upon request. It is this centralized requesting that is an element of these claims, and is missing from the Fee reference.

These elements are missing from the Fee reference. Applicants therefore respectfully submit that a prima facie case of anticipation has not been made, that this rejection of these claims is improper, and request that it be reversed.

If the Examiner has any questions regarding this application or this response, the Examiner is requested to telephone the undersigned at 775-586-9500.

Respectfully submitted,
SIERRA PATENT GROUP, LTD.

Dated: April 11, 2008

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